

**Thomas P. Riley, SBN 194706  
LAW OFFICES OF THOMAS P. RILEY, P.C.  
First Library Square  
1114 Fremont Avenue  
South Pasadena, CA 91030**

**Tel:** 626-799-9797  
**Fax:** 626-799-9795  
**TPRLAW@att.net**

**Attorneys for Plaintiff  
G & G Closed Circuit Events, LLC**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

## **G & G CLOSED CIRCUIT EVENTS, LLC,**

CASE NO. 3:12-cv-01036-NC

**Plaintiff.**

vs.

HELOISA CASTRO, et al.

**PLAINTIFF'S EX PARTE  
APPLICATION FOR AN ORDER  
CONTINUING INITIAL CASE  
MANAGEMENT CONFERENCE; AND  
ORDER (Proposed) AS MODIFIED**

## **Defendants.**

**TO THE HONORABLE NATHANAEL M. COUSINS, THE PARTIES AND THEIR  
ATTORNEY/S OF RECORD:**

Plaintiff G & G Closed Circuit Events, LLC, hereby applies *ex parte* for an order continuing the Initial Case Management Conference in this action, presently set for Wednesday, June 13, 2012 at 2:00 p.m. to a new date approximately thirty (30) to forty-five (45) days forward. This request is necessitated by the fact that the Defendants Heloisa Castro and Claudio Almeida Waqued have not yet answered Plaintiff's Complaint.

As such, as of this writing, Plaintiff has yet to receive an answer or any other responsive pleading from the defendant. As a result, Plaintiff's counsel has not conferred with the defendants concerning the claims, discovery, settlement, ADR or any of the other pertinent issues involving the case itself or the preparation of a Joint Case Management Conference Statement.

**PLAINTIFF'S EX PARTE APPLICATION FOR AN  
ORDER CONTINUING INITIAL CASEMANAGEMENT  
CONFERENCE; AND ORDER (Proposed)  
CASE NO. 3-12-CV-01036-NC**

**WHEREFORE**, Plaintiff respectfully requests that this Honorable Court continue the Initial Case Management Conference presently scheduled for Wednesday, June 13, 2012 to a new date approximately thirty (30) to forty-five (45) days forward.

Respectfully submitted,

Dated: June 6, 2012

/s/ Thomas P. Riley  
**LAW OFFICES OF THOMAS P. RILEY, P.C.**  
By: Thomas P. Riley  
Attorneys for Plaintiff  
G & G Closed Circuit Events, LLC

111

11

11

77

11

111

III

111

111

11

11

11

31

**PLAINTIFF'S EX PARTE APPLICATION FOR AN  
ORDER CONTINUING INITIAL CASEMANAGEMENT  
CONFERENCE; AND ORDER (Proposed)  
CASE NO. 3-12-CV-01036-NC  
PAGE 2**

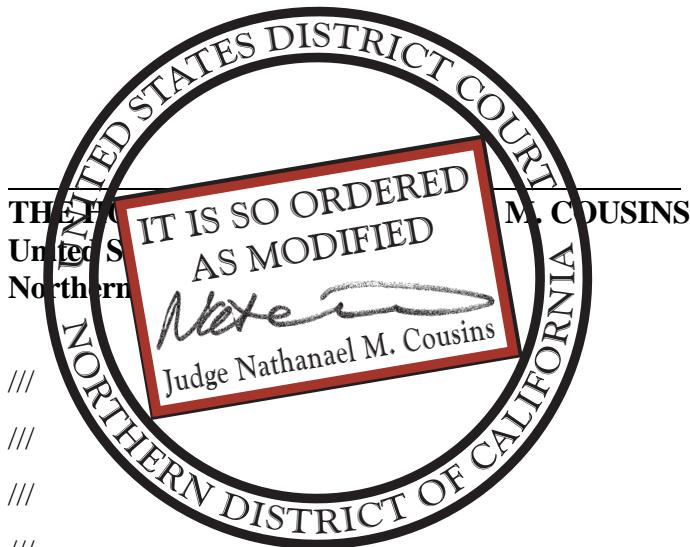
## **ORDER (Proposed)**

3 It is hereby ordered that the Initial Case Management Conference in civil action number 3:12-cv-  
continued.  
4 01036-NC styled *G & G Closed Circuit Events, LLC v. Heloisa Castro, et al.*, is hereby vacated.

5 Plaintiff shall also serve a copy of this Order on the Defendants and thereafter file a  
6 Certification of Service of this Order with the Clerk of the Court.

The Case Management Conference is set for August 1, 2012 at 10:00 a.m. Parties shall file a joint case management statement no later than July 25, 2012.

## **IT IS SO ORDERED:**



Dated: June 7, 2012

**PLAINTIFF'S EX PARTE APPLICATION FOR AN  
ORDER CONTINUING INITIAL CASEMANAGEMENT  
CONFERENCE; AND ORDER (Proposed)  
CASE NO. 3-12-CV-01036-NC  
PAGE 3**

1                   **PROOF OF SERVICE (SERVICE BY MAIL)**  
2  
3  
4

5                   I declare that:  
6  
7  
8

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
I am employed in the County of Los Angeles, California. I am over the age of eighteen years and not a party to the within cause; my business address is 1114 Fremont Avenue, South Pasadena, California 91030. I am readily familiar with this law firm's practice for collection and processing of correspondence/documents for mail in the ordinary course of business.

On June 6, 2012, I served:

**PLAINTIFF'S EX PARTE APPLICATION FOR AN ORDER CONTINUING INITIAL CASE MANAGEMENT CONFERENCE; AND ORDER (Proposed)**

On all parties in said cause by enclosing a true copy thereof in a sealed envelope with postage prepaid and following ordinary business practices, said envelope was duly mailed and addressed to:

Heloisa Castro (Defendant)  
4115 Concord Blvd., Suite 70  
Concord, CA 94519

Claudio Almeida Waqued (Defendant)  
4115 Concord Blvd., Suite 70  
Concord, CA 94519

I declare under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct, and that this declaration was executed on February 21, 2012, at South Pasadena, California.

Dated: June 6, 2012

*/s/ Maria Baird*  
**MARIA BAIRD**